

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**In re Application of GORSOAN LIMITED
and GAZPROMBANK OJSC for an Order
Pursuant to 28 U.S.C. § 1782 to Conduct
Discovery for Use in a Foreign Proceeding.**

Case No.: 17-cv-5912
ECF Case

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DECLARATION OF CAROLINE DONOVAN
IN SUPPORT OF GORSOAN'S APPLICATION FOR ADDITIONAL SUBPOENAS

I, Caroline S. Donovan, an attorney duly admitted to practice *pro hac vice* before this Court, hereby declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate with the law firm Foley Hoag LLP, and one of the attorneys for Petitioners Gorsoan Limited ("Gorsoan Ltd.") and Gazprombank OJSC ("Gazprombank" and with Gorsoan Ltd., "Gorsoan").

2. I have personal knowledge of the factual matter set forth in this declaration and I submit this declaration in connection with Gorsoan's Application for Additional Subpoenas.

3. A true and correct copy of the Subpoena to Product Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action directed to Janna Bullock, dated October 17, 2016, is attached hereto as Exhibit A.

4. A true and correct excerpted copy of the transcript from the deposition of Janna Bullock on August 8, 2018 is attached hereto as Exhibit B.

5. A true and correct copy of a Power of Attorney, dated January 24, 2007 and recorded in the Office of the City Registry, is attached hereto as Exhibit C. According to Exhibit C, Zoya Kuznetsova may be found at 120 East 87th Street, New York, NY 10028.

6. A true and correct copy of the Certified Release of Federal Tax Lien, dated April 5, 2017 and recorded in the Office of the City Registry, is attached hereto as Exhibit D.

According to Exhibit D, Stuart Sundlun may be found at 945 Fifth Avenue, New York, NY 10021.

7. A proposed Subpoena to Zoe Bullock Remmel is attached hereto as Exhibit E.

8. A proposed Subpoena to Eugenia Bullock is attached hereto as Exhibit F.

9. A proposed Subpoena to Zoya Kuznetsova is attached hereto as Exhibit G.

10. A proposed Subpoena to Stuart Sundlun is attached hereto as Exhibit H.

I declare pursuant to 28 U.S.C. § 1746 under the pains and penalties of perjury that the foregoing is true and correct.

/s/ Caroline S. Donovan
Caroline S. Donovan

DATED: August 24, 2018
Boston, Massachusetts

CERTIFICATE OF SERVICE

I, Caroline S. Donovan, hereby certify that on August 24, 2018, I caused a true copy of the foregoing document to be filed through the ECF system, and accordingly, the document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: August 24, 2018

/s/ Caroline S. Donovan

Caroline S. Donovan